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Co-Counsel for Benjamin A. Stanziale, Jr., Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

PITTRA G.B. INTERNATIONAL, INC.,

Debtor.

Bankruptcy Case No. 06-10889 (MS)

Chapter 7 Proceeding

Honorable Morris Stern

**NOTICE OF MOTION FOR APPROVAL OF SETTLEMENT WITH
MERRILL LYNCH COMMERCIAL FINANCE CORP., JPMORGAN
CHASE, N.A., E. ROSS BROWNE, EMPRESAS LOURDES, S.A. AND
JEFFREY A. LESTER, ESQ., TRUSTEE IN CHAPTER 7
FOR THE BANKRUPT ESTATE OF PAULETTE KRELMAN**

To: Counsel & Pro Se Parties

PLEASE TAKE NOTICE that the undersigned attorneys for Benjamin A. Stanziale, Jr., Chapter 7 Trustee for PITTRA G.B. International, Inc., shall apply to the United States Bankruptcy Court for the District of New Jersey, the Honorable Morris Stern presiding, on February 2, 2009 at 10:00 a.m., or as soon thereafter as counsel may be heard for approval pursuant to Bankr. R. 9019 of settlement of the claims between the Bankruptcy Estate of PITRA G.B. International, Inc., Merrill Lynch Commercial Finance Corp., JPMorgan Chase Bank, N.A., E. Ross Browne, Empresas Lourdes, S.A. and Jeffrey A. Lester, Esq., Trustee in Chapter 7 for the bankrupt estate of Paulette Krelman.

PLEASE TAKE FURTHER NOTICE that the movant shall rely upon the Certification of Benjamin A. Stanziale, Jr., Esq. dated January 8, 2009 and attached exhibits. No brief is necessary on this motion because there are no legal issues for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Bankr. R. 9013-1(a), a proposed form of order is annexed.

PLEASE TAKE FURTHER NOTICE that oral argument is waived unless opposition to this settlement is filed.

ROBERTSON, FREILICH, BRUNO & COHEN, LLC
Attorneys for Benjamin A. Stanziale, Jr., Esq.
Chapter 7 Trustee

/s/ James A. Scarpone
James A. Scarpone, Esq.

Dated: January 9, 2009